

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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FILED

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 25-CR-

**25-CR-106**

TRAVIS R. CHANDLER,  
DION J. DAVIS, and  
CORAN D. SMITH,

[18 U.S.C. §§ 1028A, 1344(1), 1344(2), &  
2(a)]

Defendants.

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**INDICTMENT**

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**THE GRAND JURY CHARGES THAT:**

**Allegations Common to All Counts**

1. Beginning by on or about March 13, 2023, and continuing through on or about March 28, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**TRAVIS R. CHANDLER,  
DION J. DAVIS, and  
CORAN D. SMITH,**

with intent to defraud, knowingly devised and participated in a scheme to defraud and to obtain money owned by and under the custody and control of federally insured financial institutions, by means of materially false and fraudulent pretenses, representations, and promises and attempted to do so, which scheme is further described below.

**The Scheme to Defraud**

2. It was part of the scheme that CHANDLER, DAVIS, and SMITH fraudulently acquired personal identifying information of other individuals, including the personal identifying

information of MH.

3. It was further part of the scheme that DAVIS and CHANDLER opened business accounts at financial institutions, including Summit Credit Union and Educators Credit Union, in the names of “Village of Westmont LLC” and “Employco II Inc.” by using fraudulent identification documents, including documents that used the personal identifying information of MH. At all relevant times, both Summit Credit Union and Educators Credit Union were financial institutions insured by the National Credit Union Administration.

4. It was further part of the scheme that DAVIS deposited a stolen check payable to the Village of Westmont, into the fraudulent Village of Westmont LLC account, and SMITH twice attempted to deposit a stolen check payable to Employco II Inc. into the fraudulent Employco II Inc. account.

5. As a result of the scheme, the defendants attempted to deposit approximately \$1.9 million worth of stolen checks into accounts they fraudulently created.

**COUNT ONE**  
(Bank Fraud)

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DION J. DAVIS,**

for the purpose of executing the above-described scheme to defraud and to obtain money owned by and under the custody and control of a financial institution, knowingly presented for deposit into a fraudulently created account a stolen State of Illinois check payable to Village of Westmont in the amount of \$250,000 at Summit Credit Union, a financial institution located at 10015 W. Greenfield Avenue in Milwaukee, Wisconsin.

In violation of Title 18, United States Code, Sections 1344(1), 1344(2), and 2(a).

**COUNT TWO**  
(Bank Fraud)

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 28, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**CORAN D. SMITH and  
TRAVIS R. CHANDLER,**

aiding and abetting each other, for the purpose of executing the above described scheme to defraud and to obtain money owned by and under the custody and control of a financial institution, knowingly presented for deposit into a fraudulently created account a stolen United States Treasury check in the amount of \$1,726,931.83 payable to Employco II Inc., and attempted to do so, at Educators Credit Union, a financial institution located at 2243 North Prospect Avenue in Milwaukee, Wisconsin.

In violation of Title 18, United States Code, Sections 1344(1), 1344(2), and 2(a).

**COUNT THREE**

(Bank Fraud)

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 28, 2023, in the State and Eastern District of Wisconsin,

**CORAN D. SMITH and  
TRAVIS R. CHANDLER,**

aiding and abetting each other, for the purpose of executing the above described scheme to defraud and to obtain money owned by and under the custody and control of a financial institution, knowingly presented for deposit into a fraudulently created account a stolen United States Treasury check in the amount of \$1,726,931.83 payable to Employco II Inc., and attempted to do so, at Educators Credit Union, a financial institution located at 7025 W. Appleton Avenue in Milwaukee, Wisconsin.

In violation of Title 18, United States Code, Sections 1344(1), 1344(2), and 2(a).

**COUNT FOUR**  
(Aggravated Identity Theft)

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2023, in the State and Eastern District of Wisconsin,

**DION J. DAVIS**

knowingly used, without lawful authority, a means of identification of another person, namely, the name of MH, during and in relation to bank fraud, as charged in Count One of this indictment, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A and 2(a).

**COUNT FIVE**  
(Aggravated Identity Theft)

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2023, in the State and Eastern District of Wisconsin,

**TRAVIS R. CHANDLER,**

knowingly used, without lawful authority, a means of identification of another person, namely, the name of MH, during and in relation to bank fraud, as charged in in Counts Two and Three of this indictment, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A and 2(a).

**COUNT SIX**  
(Aggravated Identity Theft)

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 28, 2023, in the State and Eastern District of Wisconsin,

**CORAN D. SMITH,**

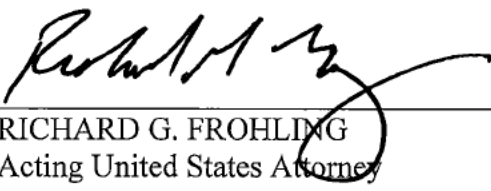
knowingly used, without lawful authority, a means of identification of another person, namely, the name of MH, during and in relation to bank fraud, as charged in Counts Two and Three of this indictment, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A and 2(a).

A TRUE BILL

FOREPERSON

Date: 5-28-25

  
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RICHARD G. FROHLING  
Acting United States Attorney